

CILENTI & COOPER, PLLC

ATTORNEYS AT LAW
60 East 42nd Street - 40th Floor
New York, New York 10165

Telephone (212) 209-3933
Facsimile (212) 209-7102

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 1/12/23

January 11, 2023

MOTION FOR STAY PENDING MEDIATION

BY ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Centre Street
New York, New York 10007

Re: Daniel J. Owens v. Smart Source Enterprises, LLC, et. al. Case
No. 22 Civ. 7042 (VSB)(GWG)

Dear Judge Broderick,

The parties write to inform the court that they have scheduled mediation in this matter on February 20, 2023. The parties ask the court to stay formal discovery and order the parties to file a joint status report promptly upon completion of mediation.

This is a joint request and we thank the court for its consideration of this case.

Respectfully submitted,

/s/ Peter H. Cooper, Esq.

Cilenti & Cooper, PLLC

Co-counsel for Plaintiff

60 East 42nd Street – 40th Floor

New York, New York 10165

/s/ Ann Margaret O'Neill, Esq.

Murphy Hesse Toomey & Lehane, LLP

Co-counsel for Plaintiff

300 Crown Colony Drive – Suite 410

Quincy, Massachusetts 02169-9126

/s/ Scott R. Green, Esq.

/s/ Charles Lazo, Esq.

Goldberg Segalla

Counsel for Defendants

200 Garden City Plaza – Suite 520

Garden City, New York 11530-3203